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Via ECF Filing

July 30, 2014

Honorable Analisa Torres United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312

Re: XL Specialty Insurance Company v. Lakian, et al.

Case No. 14-cv-5225

Dear Judge Torres:

We represent Kobre & Kim, LLP, a named defendant in the abovereferenced case, which has not yet been served with process.

We write regarding the pre-motion conference requested by proposed intervenors, Knox, LLC d/b/a Knox, LLC of New York ("Knox") and DJW Advisors, LLC (DJW"), both of which seek intervention as of right in the above referenced interpleader action pursuant to Fed. R. Civ. P. 24(a) or, in the alternative, permissive intervention pursuant to Fed. R. Civ. P. 24(b).

Although Kobre & Kim LLP has not been formally served with process and thus is currently under no obligation to respond to the pre-motion conference request, we do wish to file a response. However, due to scheduling conflicts with other client work and previously planned travel, we request an additional 3 business days to respond.

If we were required to respond to the request, the response would be due Wednesday, July 30, 2014. We have not previously sought an extension of time to respond to the request. We have conferred with counsel for Knox and DJW who do not oppose our request for an extension of time to respond.

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Accordingly, we respectfully request a brief extension of three business days, through and including Monday, August 4, 2014 to respond to Knox and DJW's pre-motion conference request.

Respectfully yours,

/s/ Edward J. Stein

Edward J. Stein

cc: Hon. Analisa Torres (<u>Torres NYSDChambers@nysd.uscourts.gov</u>)
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